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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In re:)	Case No. 10-18839-RGM
)	
)	(Jointly Administered with Case No. 11-
MIN SIK KANG AND MAN SUN KANG,)	10200-RGM)
)	
)	Chapter 11
)	
Debtors.)	Adversary No. 12-1504-RGM
)	
In re:)	REQUEST FOR SPECIAL NOTICE,
)	SERVICE OF PAPERS AND
MS GRAND, INC.)	RESERVATION OF RIGHTS
)	
Debtor.)	
)	[No Hearing Required]
OFFICIAL COMMITTEE OF UNSECURED)	
CREDITORS BY AND ON BEHALF OF MS)	
GRAND, INC. AND ITS BANKRUPTCY)	
ESTATE,)	
)	
Plaintiff,)	
)	
vs.)	
)	
MELROSE PARK EQUITY, LLC et al.)	
)	
)	
Defendants)	

TO THE CLERK OF THE COURT AND TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that pursuant to Rules 2002, 3017, 4001, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, NewMark Merrill Companies, et al. ("NewMark

Case No. 12-1504-RGM

REQUEST FOR SPECIAL NOTICE

Merrill”) requests that notice of all matters in the above-captioned case which requires notice to creditors, or to other parties in interest including, without limitation, all notices and papers referred to in Federal Rules of Bankruptcy Procedure 2002, 4001 and 9007, and additionally including, without limitation, copies of any orders, applications, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in these cases, whether formal or informal, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in this case, whether formal or informal, and other matters, whether written or oral, and whether transmitted or conveyed by mail, delivery, facsimile, telephone or otherwise, be sent to counsel for NewMark Merrill as follows:

Ian S. Landsberg
Landsberg & Associates
A Professional Law Corporation
5950 Canoga Avenue Suite 605
Woodland Hills, CA. 91367
Telephone: (818) 855-5900
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Request is made that the Clerk of the Court and all parties in interest to which this Request for Special Notice is being mailed, place the foregoing name and address on any mailing matrix or list of creditors to be prepared or existing in this proceeding. Neither this Request for Notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct, shall constitute a waiver of NewMark Merrill:

(a) Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court;

(b) Right to a trial by jury in any case, controversy or proceeding as to any and all matters so triable, notwithstanding the designation *vel non* of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2), and regardless of whether such jury trial is pursuant to statute or

1 the United States Constitution;

2 (c) Right to have the reference withdrawn by the United States District Court in
3 any manner or Proceeding subject to mandatory or discretionary withdrawal; and

4 (d) Other rights, claims, actions, defenses, setoffs, recoupments or other matters
5 to which Aroth is entitled under any agreements or at law or in equity or under the United States
6 Constitution.

7 All of the above rights are expressly reserved by NewMark Merrill without exception, and
8 without conceding jurisdiction in any way by this filing or by any other participation in this
9 bankruptcy case.

10 Dated: January 18, 2013

LANDSBERG & ASSOCIATES
A Professional Law Corporation

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12
13 By: /s/ Ian S. Landsberg
14 Ian S. Landsberg
Attorneys for NewMark Merrill Companies, et al.

PROOF OF SERVICE

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: *5950 Canoga Avenue Suite 605, Woodland Hills, CA. 91367*

A true and correct copy of the foregoing document described as **"REQUEST FOR SPECIAL NOTICE, SERVICE OF PAPERS AND RESERVATION OF RIGHTS"** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On, checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☐ Service information continued on attached page

II. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL**(indicate method for each person or entity served): On January 18, 2013 served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. **SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

January 18, 2012

Diana Zuniga

/s/ Diana Zuniga

Date

Type Name

Signature

SERVICE LIST

Served Via U.S. Mail:

United States Bankruptcy Court
200 S. Washington Street
Alexandria, VA. 22314-5405

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